



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

MAY 11 2015

Mr. John D. Beresford  
President  
Native American Environmental Protection Coalition (NAEPC)  
27368 Via Industria, Suite 105  
Temecula, California 92590

RE: U.S EPA Indian Environmental General Assistance Program  
GA-00T76601-2  
Application Due: JUN 15 2015

Dear President Beresford:

I am pleased to inform you that your proposal submitted to this office under the U.S. Environmental Protection Agency's Indian Environmental General Assistance Program (GAP) has been tentatively approved for funding. At this time, I am setting aside \$97,000 of funding to support your GAP for one year.

According to our latest projections, the Tribe had approximately \$19,000 of unliquidated GAP obligations remaining in Fiscal Year 2014. This balance, along with the \$97,000 of new GAP funding will provide the Tribe with \$116,000 to support GAP work plan activities from November 1, 2015 through October 31, 2016. Although your SF-424 Budget Summary should reflect only the \$97,000 of new funding we will be awarding the Tribe, please prepare a budget breakdown and the budget detail showing how the entire \$97,000 will be utilized. To avoid confusion with how much new funding the Tribe will be receiving, please ensure the budget breakdown is not provided on a SF-424 form. The sample budget breakdown titled "Unliquidated Obligation Budget Breakdown," showing how new funds and unspent grant funds should be combined into a single budget breakdown, is attached for your reference.

In addition, we have not received NAEPC's FY2015 1<sup>st</sup> and 2<sup>nd</sup> quarterly reports and all associated deliverables from the current grant year. Moreover, the Tribe has not submitted associated deliverables from the previous grant year. These reports are due 30 days after the end of each quarter. Timely submission of quarterly reports and deliverables are part of the programmatic terms and conditions of your GAP grant. **An award for FY 2016 cannot be made until the Tribe's reporting is brought current. Continued failure to submit these reports may result in a delay, reduction, or denial of the Tribe's FY 2016 award.**

**Work plan submission, negotiation, and approval will be conducted electronically in GAP Online.** The comments attached here for your reference are also available in GAP Online. If we receive your complete application and an **approvable** revised work plan by the due date we will make every effort to award the grant by September 30, 2015. This funding will support work plan activities **from November 1, 2015 to October 31, 2016**. Please do not incur any costs under this work plan until the official grant award document has been signed and dated by the EPA Award Official. Any costs incurred before the date of award will not be reimbursed.



This letter does not constitute a grant award. In order to receive funding, the Native American Environmental Protection Coalition will need to complete an Application for Federal Assistance (SF-424). **The complete application, including an approvable work plan, must be submitted for EPA review by the due date indicated above.** Materials can be submitted earlier and will be processed on a first-come, first-served basis. Please note that in completing your application, you will need to enter the GAP Catalog of Federal Domestic Assistance Number (CFDA), required in box #11 on the SF-424A application form, 66.926.

**New Process for Submitting Your GAP Grant Application**

Effective February 17, 2015, EPA grant applicants **must** use Grants.gov to submit their applications. The Grants.gov registration process can take up to 30 days to complete. Therefore, it is highly recommended that EPA applicants complete their registration on Grants.gov now. Also, your organization's registration in SAM.gov must be active to utilize Grants.gov. If it appears that the grants.gov registration process may prevent you from submitting your application by the due date aforementioned, then please contact [Support@grants.gov](mailto:Support@grants.gov) or call 1-800-518-4726 as support is available 24 hours a day and 7 days a week. You should also notify your Project Officer before the application due date to request an extension.

Please review both Attachment 2 (Grants.gov Instructions Guide) and Attachment 3 (Region 9 Guidance Information for Applicants) or go to <http://www.epa.gov/region9/funding/information.html> to find additional resources on Grants.gov, Federal Regulations, and new EPA requirements. We suggest you forward these materials to your Project Manager, Financial Officer and any other personnel in your organization requiring this information.

I look forward to working with you and your staff under the General Assistance Program. Questions regarding the completion of the application forms as well as the mandatory use of grants.gov should be referred to Danielle Carr, Grants Management Specialist, at (415) 972-3871. You can also contact your GAP Project Officer, Morena Villanueva at (415) 947-4239 if you have questions regarding this letter, the workplan or the General Assistance Program.

Sincerely,



Laura M. Ebbert  
Manager  
Tribal Section

Enclosures

1. Work Plan Comments
2. Component Costs and work years
3. Budget Breakdown Sample
4. Grants.gov Instructions Guide
5. Region 9 Guidance Information for Applicants

cc: Jill Sherman-Warne, Executive Director (with workplan comments)



## **GAP 2015-2016 Work Plan Comments NAEPC**

Thank you for developing an outcome-oriented workplan. The following observations and requests were written with the intent of strengthening the Tribe's GAP workplan, identifying possible assistance, and ensuring the workplan meets GAP guidelines. These comments pertain to the 2015-2016 work plan that was submitted with your GAP proposal in GAP Online in December 2014. Please ensure that these comments are addressed in your final GAP workplan in GAP Online.

### **General Definitions and References**

1. The following references are useful for understanding GAP in general, for getting an understanding for environmental outcomes, etc.  
2013 Guidance on the Award and Management of General Assistance Program Agreements and Appendix I, Guidebook for Building Tribal Environmental Program Capacity  
<http://www.epa.gov/region9/funding/pdfs/tribal-gap/r9-gap-guidance.pdf>  
GAP Act (<http://www.epa.gov/Indian/pdfs/4368b.pdf>)  
2015 GAP Grant Notification (<http://www.epa.gov/region09/funding/tribal-gap.html>)  
EPA Strategic Plan (<http://www2.epa.gov/planandbudget/strategicplan>)
2. Environmental outcomes should be expressed in terms of improvements to public health, the environment, or human behavior. They can also reflect improved tribal capacity to protect public health or the environment. Intermediate outcomes could reflect a) improved human health or environmental conditions, b) reduced risks to human health or the environment c) increased tribal capabilities in legal, enforcement, technical, communication, or administrative areas. Long-term outcomes could include attainment of desired environmental conditions (e.g., water quality standards are met) or human health goals, or attainment of desired capacity to plan, develop, implement, manage and sustain tribal environmental programs.
3. Please correct any typographic errors incurred as a result of pasting your work plan into GAP online; please note that GAP Online does not accept special punctuation or characters, including quotation marks, apostrophe, semicolon, or parenthesis.
4. Please ensure that each component in your work plan contains one or more capacity indicators that appropriately links to the commitments. Capacity indicators represent the destination of the Tribe's work and therefore the Tribe should express how it will accomplish the tasks necessary to achieve the indicators proposed in its commitments. Moreover, capacity indicators should ideally be placed in the "Measures" section for each component in the work plan. More information on the appropriate use of indicators is found on page 13 of the GAP Guidance. A suite of indicators that the Tribe may consider for inclusion in its work plan is contained in Appendix I of the GAP Guidebook.
5. Please ensure that the total workplan Estimated Component Costs add up to the total approved budget amount indicated in the cover letter, and that the total workplan Estimated Work Years adds to the total number of approved personnel funded under GAP. I have attached a document entitled "Component Cost and Work Years Guidance" that will help you to correctly identify Component Costs and Work Years to comply with this request.
6. EPA Region 9 has adopted a Greening Grants Policy which encourages grantees to carry out their EPA grant funded projects in a greener way. Your Project Officer will work with you to determine whether it is feasible to incorporate green practices into your work plan. The Greening Grants Policy

includes an attachment which describes many useful green practices. The policy furthers the objectives of EPA's 2011-15 Strategic Plan. The link to Greening Grant Policy is on the Region 9 Website Homepage, <http://www.epa.gov/region9/funding/greening-grants.html>

### **Budget Comments**

- The total FTE in your FY16 proposal exceeds that funded in the FY15 approved budget. Since EPA is unable to approve the total amount of requested funds, the Tribe should be aware that any increases in FTE under this GAP grant involves a risk: the Tribal Program Office cannot guarantee that funding for increased FTE can be maintained through future funding cycles, especially given that funding of the GAP program at a national level has not increased significantly over the last few budget cycles and in some years we have experienced a net reduction. The Tribe is advised to consider these issues when choosing to fund additional FTE within the GAP program. If you choose to increase funding for FTE, this will likely result in a decrease in funds available to operate the program.
- The request for a video conference equipment was not funded at this time. Please ensure this line item is deleted in your final budget application.

### **Work Plan Comments**

- **Additional funding support may be considered when EPA receives justification of other activities in the work plan, specifically:**
  - **Environmental Education & Training Coordinator:** Please provide a list of activities as for 2015/2016 and a list of training/workshop including deliverables completed to date.
  - **Financial Manager/Administrative Assistant:** Please provide a list of activities for 2015/2016.
  - **Audit/Accountant in the amount of \$8,000:** Purpose of the audit/accountant.
  - **Legal in the amount of \$3,000:** Please provide justification for the need of legal assistance.
  - **Workshop expenses:** Please provide a list of workshops and the anticipated dates of these workshops. EPA will not approve an activity that repeats from the prior year.
  - **Insurance:** Please provide justification for this request.
  - **Audit:** Please provide a copy of the most recent NAEPC audit.
- Throughout the work plan, commitment end dates are identified as 10/31/16. Please indicate the correct end dates. Commitment end dates should reflect the actual expected completion date of the commitment, and should not all reflect the end of the grant year.
- Throughout the work plan, intermediate outcomes are written as actions rather than intermediate outcomes. Intermediate outcomes are broader in scope than short-term outcomes and often build upon the progress achieved in the short-term. Under the GAP, changes in tribal awareness and understanding pave the way for planning, development, and initiation of capacity-building activities. The GAP logic model (see GAP Administration link in Section B) includes examples of activities that represent increased capability in the legal, enforcement, technical, communications, and administrative arenas. Please revise and provide appropriate intermediate outcomes of each component.

- Throughout the work plan, outputs and deliverables are written as commitments. Environmental outputs are environmental activities, efforts, and/or associated work products that help achieve environmental outcomes. Outputs may be quantitative or qualitative but must be “delivered” during the work plan period they are associated with. Please ensure NAEPC submits appropriate outputs and deliverables for each commitment.
- Please correct the numerous typographical errors throughout the work plan.
- Earth Day environmental education supplies listed in the supplies section of the budget could mean the purchase of promotional items. If promotional items are to be purchased, please list what types will be purchased, the quantity and the cost.
- Please ensure each commitment provides **why** the Tribe has proposed each activity, **who** will need to do **what**, **where**, **when** and **how**, to complete proposed activities. This type of information helps quantify the level of effort (FTE and Cost) required to complete commitments, which in turn helps project officers determine if identified costs appear reasonable. Build this type of information into each of your commitment descriptions.
- **Some or all of the commitments are identical to those in the 2014-2015 GAP work plan. EPA will not be able to approve a work plan that generally repeats activities from the prior year.**

#### **Component 1: Program Administration, Financial Management and General Operations**

The cost of this component seems high. Please provide additional information to support the anticipated component cost.

1.3 This commitment proposes work that is scheduled for completion in the 2014-2015 work plan. EPA will not be able to approve an activity that repeats from the prior year.

#### **Component 2: Organization and Facilitation of Trainings in Alignment of EPA’s Strategic Goals**

The estimated cost for this component is high for only one commitment. Either add more commitments or reduce the estimated component cost.

Intermediate Outcome: Please delete the fifth line in the intermediate outcome section as this is not relevant to the work plan activities.

2.1 and 2.2 Please provide a list of the new 12 trainings and workshops NAEPC will coordinate that will not duplicate capacity efforts built in the 2014-2015 work plan. In addition, please include a list of attendees at each training or workshop as deliverables.

#### **Component 3: Tribal Community Education and Outreach in Alignment with EPA’s Strategic Goals**

3.1 This is a very ambitious commitment and thus EPA would like to see the actual number of Earth Day events NAEPC will attend. In addition, please clarify how many outreach activities will be attended. Currently it is unclear if NAEPC will attend 12 or 20 activities.

3.2 Please identify types of support NAEPC will provide to tribal working groups. In addition, the outputs and deliverables language should be moved to the description field. List of training obtained and the numbers of participants at each event are appropriate deliverables. Moreover, this activity is a repeat to those in the 2014-2015 work plan. Please delete this commitment or replace it with another GAP capacity building activity.

#### **Component 4: Partnership Building to Obtain New Training Opportunities and Information Networking**

4.1 This commitment proposes work that is scheduled for completion in the 2014-2015 work plan. EPA will not be able to approve an activity that repeats from the prior year.

#### **Component 5: Information Systems and Maintenance of NAEPC Website and Social Media (Recommend revising the component title to: Information Systems and Social Media)**

- EPA highly recommends that NAEPC update their website regularly and post upcoming trainings, workshops and other events that it will host.
- Furthermore, Facebook is a free social media. Please provide justification for the commitment estimated cost of \$1,649.

#### **Component 6: Tribal Border Liaison**

The estimated component cost is high for maintaining tribal contact lists and maintaining a website that is not operational. Please provide additional justification to support the component cost.

6.1 It appears that these website updates were already included in component 5 and so please delete this commitment. In addition, the first two sentences in the outputs and deliverables should be moved to the description field. The last sentence is an appropriate deliverable to be submitted to EPA.

6.2 The estimated cost of this commitment seems high and so either add more activities or reduce the commitment cost. The outputs and deliverables should be moved to the description field except the last two sentences as these are appropriate deliverables to be submitted to EPA.

6.3 Outputs and deliverables should be moved to the description field. A copy of the annual report is an appropriate deliverable to be submitted to EPA.



## Component Cost and Work Years Guidance

Applications must include estimated component cost and associated work years. At present, Tribes are providing estimated costs that do not, when added together, equal the total budget request and budgeted FTE supplied with the work plan.

Suggested instructions for Tribes:

Estimated Component Costs should, when added together, equal the total budgeted amount. Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of financial resources each work plan task will take, each task being some percentage of 100; multiply that percentage by the total budgeted cost to get the estimated cost per component.

|                      | Component 1 | Component 2 | Component 3 | Total Budget |
|----------------------|-------------|-------------|-------------|--------------|
| Percentage of Total: | 25%         | 45%         | 30%         | 100%         |
| Cost:                | \$ 29,319   | \$ 52,774   | \$ 35,183   | \$ 117,275   |

- 2) Alternately, as an addendum to calculation of the Total Program Budget, add columns wherein the contribution of each component to the total budget is calculated, and total component budgets across budget categories, applying indirect costs if applicable, personnel costs, and fringe. This "estimate" leans more toward accurate budget numbers.

| Category          | TOTAL      | Component 1 | Component 2 | Component 3 |
|-------------------|------------|-------------|-------------|-------------|
| (FTE)             | 1.5        | 0.375       | 0.6         | 0.525       |
| Personnel         | \$ 55,000  | \$ 13,750   | \$ 22,000   | \$ 19,250   |
| Fringe            | \$ 18,150  | 4,537.50    | 7,260.00    | 6,352.50    |
| Supplies          | \$ 5,000   | 500         | 4100        | 400         |
| Travel            | \$ 5,000   | 4200        | 800         | 0           |
| Equipment         | \$ -       | 0           | 0           | 0           |
| Contractual       | \$ 15,000  | 4000        | 8000        | 3000        |
| Subtotal          | \$ 98,150  | \$ 26,988   | \$ 42,160   | \$ 29,003   |
| Base for Indirect | \$ 83,150  | \$ 22,988   | \$ 34,160   | \$ 26,003   |
| Indirect          | \$ 19,125  | \$ 5,287    | \$ 7,857    | \$ 5,981    |
| Total             | \$ 117,275 | \$ 32,275   | \$ 50,017   | \$ 34,983   |

Estimated Component work years should, when added together, equal the total budgeted FTE for the program. One work year is equal to 2,080 personnel hours. A work year is also known as a full time equivalent (FTE), since it is based on a full time job; 40 hours per week \* 52 weeks per year = 2,080 hours per year.

Two suggested ways to arrive at numbers that are equal:

- 1) Evaluate the relative *percentage* of staffing resources each work plan component will require, each component being some percentage of 100; multiply the percentage for each component by the total requested FTE to arrive at the estimated FTE per component.

| staffing             | Component 1 | Component 2 | Component 3 | Total Budget |
|----------------------|-------------|-------------|-------------|--------------|
| Percentage of Total: | 25%         | 40%         | 35%         | 100%         |
| Cost:                | 0.38        | 0.60        | 0.53        | 1.50         |

- 2) Alternately, when calculating the budget in the detailed manner for the Estimated Component Cost, take the FTE applied to each component and use that value to represent the estimated component FTE.



### Unliquidated Obligation Budget Breakdown Sample

This example is where we are requesting the Tribe to rebudget carryover from prior periods into Year Four of a four-year GAP grant.

|                         | FY12              |                | FY13              |                | FY14              |                       | FY15        |                                 |
|-------------------------|-------------------|----------------|-------------------|----------------|-------------------|-----------------------|-------------|---------------------------------|
|                         | Initially Awarded | Actual Budget* | Initially Awarded | Actual Budget* | Initially Awarded | Projected Utilization | New Funding | Unliquidated Obligation Funding |
| Personnel               | \$ 35,000         | \$ 21,000      | \$ 37,000         | \$ 25,900      | \$ 37,000         | \$ 37,000             |             | \$ 36,650                       |
| Fringe                  | \$ 10,000         | \$ 6,000       | \$ 10,500         | \$ 7,350       | \$ 10,500         | \$ 10,500             |             | \$ 10,340                       |
| Travel                  | \$ 5,000          | \$ 1,400       | \$ 5,000          | \$ 3,600       | \$ 5,000          | \$ 5,000              | \$ 5,000    |                                 |
| Equipment               | \$ -              | \$ -           | \$ -              | \$ -           | \$ -              | \$ -                  |             |                                 |
| Supplies                | \$ 3,000          | \$ 1,000       | \$ 2,800          | \$ 1,960       | \$ 3,000          | \$ 3,000              | \$ 3,000    |                                 |
| Contractual             | \$ -              | \$ -           | \$ -              | \$ -           | \$ -              | \$ -                  |             |                                 |
| Other                   | \$ 10,000         | \$ 5,000       | \$ 9,000          | \$ 7,100       | \$ 10,000         | \$ 10,000             | \$ 10,000   |                                 |
| Subtotal                | \$ 63,000         | \$ 34,400      | \$ 64,300         | \$ 45,910      | \$ 65,500         | \$ 65,500             | \$ 18,000   | \$ 46,990                       |
| Indirect                | \$ 15,750         | \$ 8,600       | \$ 16,075         | \$ 11,478      | \$ 16,375         | \$ 16,375             | \$ 4,500    | \$ 11,748                       |
| Total                   | \$ 78,750         | \$ 43,000      | \$ 80,375         | \$ 57,388      | \$ 81,875         | \$ 81,875             | \$ 22,500   | \$ 58,738                       |
| Unliquidated Obligation |                   | \$ 35,750      |                   | \$ 22,988      |                   | \$ -                  |             |                                 |

\*Revised budgets reflect actual expenditures, as shown on Federal Financial Reports submitted by the Tribe.



## EPA Region 9 - Grants.gov Instructions Guide

( March 2015 )

*Applications for Federal assistance must be submitted through Grants.gov.*

**Register with Grants.gov!** In order to submit your application using Grants.gov, your organization must be registered with Grants.gov. Please allow four weeks to complete the registration process. Also, please note that you must have a DUNS number and an active SAM.gov registration before registering with Grants.gov. You can find more information about registering at:

<http://www.grants.gov/web/grants/applicants/organization-registration.html>


**To Access and Download Grant Application Package go to:**

<http://www.grants.gov/web/grants/applicants/download-application-package.html>

### 1. Funding Opportunity Number (FON).

- A. Competitive Programs: Refer to the competitive solicitation for the applicable FON. Applicant will enter this into the "Funding Opportunity Number" field to locate the application package.
- B. Non-Competitive Discretionary Programs: Obtain FON from your EPA Point of Contact (POC). Applicant will enter this into the "Funding Opportunity Number" field to locate the application package.
- C. Continuing Environmental Programs (CEPs): The list of available CFDA numbers for CEPs have been divided between two FONs. The two FONs used to access the application packages are **EPA-CEP-01** and **EPA-CEP-02**. Refer to the following Attachment to determine which FON your CFDA is published under. Applicant will enter this into the "Funding Opportunity Number" field to locate the packages.

CFDA Number:  (#)

 Funding Opportunity Number:  (C)

Funding Opportunity Competition ID:  (C)

- 2. **Download the package** associated with CFDA 66.XXX.
- 3. **Complete the Grant Application Package.** Attach the forms and information required by your particular program. *Contact your EPA POC if you have questions about which forms and materials you must submit for your program.*
- 4. **Submit your application.** Go to <http://www.grants.gov/web/grants/applicants/apply-for-grants.html> for more information on this process.
- 5. **Confirm with your EPA POC** that EPA has received your application package. *If for ANY reason you cannot submit your application by the deadline specified, contact your EPA POC immediately.*

For FAQs, User Guides, Checklists, Training and Technical Support, visit the Grants.gov Applicant Resource page at <http://www.grants.gov/web/grants/applicants/applicant-resources.html>

**Technical Questions or Issues?** Please call (1-800-518-4726) or email ([support@grants.gov](mailto:support@grants.gov)) the Grants.gov Contact Center (<http://www.grants.gov/web/grants/about/contact-us.html>). Help is available 24 hours a day, 7 days a week.

# Grants.gov Instructions Guide

Continuing Environmental Programs (CEPs)

(EPA Mandatory Grant Programs)

## ATTACHMENT

### CFDAs Under EPA-CEP-01

|        |   |
|--------|---|
| 66.001 | Air Pollution Control Program Support   |
| 66.032 | State Indoor Radon Grants   |
| 66.034 | Surveys, Studies, Research, Investigations, Demonstrations, and Special Purpose Activities Relating to the Clean Air Act  |
| 66.038 | Training, Investigations, and Special Purpose Activities of Federally-Recognized Indian Tribes Consistent With the Clean Air Act (CAA), Tribal Sovereignty and the Protection and Management of Air Quality |
| 66.040 | State Clean Diesel Grant Program<br>This program contains Recovery Act funding.   |
| 66.042 | Temporally Integrated Monitoring of Ecosystems (TIME) and Long-Term Monitoring (LTM) Program  |
| 66.121 | Puget Sound Protection and Restoration: Tribal Implementation Assistance Program  |
| 66.124 | Coastal Wetlands Planning Protection and Restoration Act  |
| 66.125 | Lake Pontchartrain Basin Restoration Program (PRP)  |
| 66.202 | Congressionally Mandated Projects   |
| 66.418 | Construction Grants for Wastewater Treatment Works<br>This program contains Recovery Act funding.   |
| 66.419 | Water Pollution Control State, Interstate, and Tribal Program Support   |
| 66.432 | State Public Water System Supervision   |
| 66.433 | State Underground Water Source Protection   |
| 66.437 | Long Island Sound Program   |
| 66.454 | Water Quality Management Planning<br>This program contains Recovery Act funding.  |
| 66.456 | National Estuary Program  |
| 66.458 | Capitalization Grants for Clean Water State Revolving Funds<br>This program contains Recovery Act funding.  |
| 66.460 | Nonpoint Source Implementation Grants   |
| 66.466 | Chesapeake Bay Program  |
| 66.468 | Capitalization Grants for Drinking Water State Revolving Funds<br>This program contains Recovery Act funding.   |
| 66.469 | Great Lakes Program   |
| 66.472 | Beach Monitoring and Notification Program Implementation Grants   |
| 66.473 | Direct Implementation Tribal Cooperative Agreements   |
| 66.481 | Lake Champlain Basin Program  |
| 66.482 | Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Capitalization Grants For Clean Water State Revolving Funds   |
| 66.483 | Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Capitalization Grants for Drinking Water State Revolving Funds  |
| 66.508 | Senior Environmental Employment Program<br>This program contains Recovery Act funding.  |
| 66.517 | Regional Applied Research Efforts (RARE)  |
| 66.518 | State Senior Environmental Employment Program   |
| 66.600 | Environmental Protection Consolidated Grants for the Insular Areas - Program Support  |
| 66.605 | Performance Partnership Grants  |

### CFDAs Under EPA-CEP-02

|        |  |
|--------|--|
| 66.700 | Consolidated Pesticide Enforcement Cooperative Agreements  |
| 66.701 | Toxic Substances Compliance Monitoring Cooperative Agreements  |
| 66.707 | TSCA Title IV State Lead Grants Certification of Lead-Based Paint Professionals  |
| 66.714 | Regional Agricultural IPM Grants   |
| 66.801 | Hazardous Waste Management State Program Support   |
| 66.802 | Superfund State, Political Subdivision, and Indian Tribe Site-Specific Cooperative Agreements<br>This program contains Recovery Act funding. |
| 66.804 | Underground Storage Tank Prevention, Detection and Compliance Program  |
| 66.805 | Leaking Underground Storage Tank Trust Fund Corrective Action Program<br>This program contains Recovery Act funding.                         |
| 66.808 | Solid Waste Management Assistance Grants   |
| 66.809 | Superfund State and Indian Tribe Core Program Cooperative Agreements   |
| 66.817 | State and Tribal Response Program Grants   |
| 66.819 | Disaster Relief Appropriations Act (DRAA) Hurricane Sandy Leaking Underground Storage Tank Trust Fund Corrective Action Program              |
| 66.926 | Indian Environmental General Assistance Program (GAP)  |
| 66.931 | International Financial Assistance Projects Sponsored by the Office of International and Tribal Affairs                                      |

**ATTACHMENT**  
**Region 9 Guidance Information for Applicants**

- Omni-Circular under **2 CFR 200** & EPA Regulations under **2 CFR 1500**:

EPA has officially adopted the OMB Omni-Circular effective **December 26, 2014**. Specifically, in a **joint interim final rule** published in the Federal Register on December 19, 2014 (see 79 Fed. Reg. 76050-76063), EPA adopted the Omni-Circular. This includes adoption of Omni-Circular requirements located at **2 CFR 200** along with EPA-specific provisions mandated by statute, regulation or agency policy now codified under **2 CFR 1500**. OMB's website at <https://cfo.gov/cofar/> is the location for resources regarding the Omni-Circular, including **OMB's Frequently Asked Questions (FAQ)**.

Federal Register:

<http://www.gpo.gov/fdsys/pkg/FR-2014-12-19/pdf/2014-28697.pdf>

2 CFR 200:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=4467ef7edf6418328185fed45270f1f&node=pt2.1.200&rgn=div5>

2 CFR 1500:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=ac772c78043ca73b46f5d168dd3f038f&tpl=/ecfrbrowse/Title02/2chapterXV.tpl>

OMB's FAQ:

<https://cfo.gov/wp-content/uploads/2014/11/2014-11-26-Frequently-Asked-Questions.pdf>

- **Interim Financial Assistance Conflict of Interest Policy:**

In accordance with the Omni-Circular's Conflict of Interest disclosure requirements under **2 CFR 200.112**, EPA issued the **Interim Financial Assistance Conflict of Interest Policy**. Requirements include applicants providing a prominently titled conflict of interest disclosure statement attached to the SF 424, if applicable. This policy applies to all individuals and non-federal entities requesting and receiving EPA financial assistance on or after **December 26, 2014**.

Interim Policy:

[http://www.epa.gov/ogd/epa\\_interim\\_financial\\_assistance\\_coi\\_policy.htm](http://www.epa.gov/ogd/epa_interim_financial_assistance_coi_policy.htm)

- **Submission of Grant Applications via [Grants.gov](http://www.grants.gov):**

Effective **February 17, 2015**, EPA grant applicants must use [Grants.gov](http://www.grants.gov) to submit their applications. It is highly recommended that EPA applicants complete their registration on Grants.gov now, since the entire process can take up to 30 days to complete. Information located at **Submitting an Application to Grants.gov Apply** and **Applicant Resources** for Grants.gov will help you get started. Applicants are also encouraged to view a previously recorded **EPA Information Webinar** session/ presentation regarding Grants.gov or register for an available session.

Grants.gov support/assistance is available 24 hours a day 7 days a week at 1-800-518-4726 or [Support@grants.gov](mailto:Support@grants.gov). Also, the **Region 9 Application Checklist** will help ensure your EPA application submitted through Grants.gov is complete.

Guide on Submitting an Application to Grants.gov:

<http://www.epa.gov/ogd/guide/submitting.htm>

Grants.gov Application Resources:

<http://www.grants.gov/web/grants/applicants/applicant-resources.html>

EPA Information Sessions/Webinars:

[http://www.epa.gov/ogd/training/grants\\_gov\\_information\\_sessions\\_for\\_applicants.htm](http://www.epa.gov/ogd/training/grants_gov_information_sessions_for_applicants.htm)

Region 9 Interim Application Checklist:



- **Bundling of Grant Application Certifications (for States & Tribes):**

State and Tribal applicants are highly encouraged to submit annually a single set ("bundling") of application certification forms with a cover letter. The letter must indicate the applicable timeframe (usually a federal or state fiscal year) of the certifications for all EPA grant applications received by Region 9 Grants Management Office (GMO) within that period. GMO accepts Adobe format (.pdf) of the letter with applicable signed certification(s) through the electronic mail box: [grantsregion9@epa.gov](mailto:grantsregion9@epa.gov). Please note that updated forms must be submitted when changes to the responses are required. The following certifications can be bundled:

- ❖ [Standard Form \(SF\) 424B, Assurances for Non-Construction Programs](#)
- ❖ [EPA Form 6600-06, Certification Regarding Lobbying, Certification for Contracts, Grants, Loans and Cooperative Agreements](#)
- ❖ [EPA Form 4700-4, Preaward Compliance Review Report for All Applicants Requesting EPA Financial Assistance](#)

Applicants are highly encouraged to use bundling of their certifications if multiple EPA applications are submitted annually. Bundling can be especially helpful as EPA is transitioning to Grants.gov. Please contact your EPA Grants Specialist for questions regarding bundling.

EPA Application Forms:

<http://www.epa.gov/ogd/forms/forms.htm>

- **Changes to the Minority & Women Business Enterprise (M/WBE) Utilization Reporting Requirement:**

The EPA issued a revised class deviation from [40 CFR 33.502](#) on **December 4, 2014**, which supersedes the M/WBE reporting requirement specified in the recipient's Notice of Award. The EPA financial assistance recipients are now required to report annually when certain conditions are met to reach a threshold of \$150,000. Please review the current information from [EPA's Small Business Programs](#).

40 CFR 33:

[http://www.ecfr.gov/cgi-bin/text-idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?SID=04eada1fb1292e21ecf2434ad7bf3781&tpl=/ecfrbrowse/Title40/40cfr33_main_02.tpl)

EPA's Small Business Programs:

[http://www.epa.gov/osbp/dbe\\_reporting.htm](http://www.epa.gov/osbp/dbe_reporting.htm)

- **Grants Management Training Materials for Tribal Organizations:**

The EPA's Office of Grants and Debarment (OGD) worked with the national Partnership for Environmental Technology Education (NPETE) to develop [training materials for Tribal organizations](#). While OGD is no longer able to offer in-person trainings, the training materials, including the training manuals and webinar recordings, are available for download.

Recipient Training:

[http://www.epa.gov/ogd/training/recip\\_train.htm](http://www.epa.gov/ogd/training/recip_train.htm)